

### REMARKS

The Office Action mailed September 30, 2003 has been carefully reviewed and the foregoing amendment and following remarks are made in consequence thereof.

Claims 1-20 are pending in this application. Claims 1-20 stand rejected.

The rejection of Claims 1-20 under 35 U.S.C. § 103 as being unpatentable over Raz (U.S. Pat. No. 6,292,827) in view of Buzsaki (U.S. Pat. No. 5,987,422) is respectfully traversed.

Raz describes an information transfer network system that includes client terminals (12), servers (18), a request broker system (40), and an information management system (23). The client terminals include a presentation system, and a control and management agent system (17). The servers include a database system (22), an application system (19), and a control and management agent system (21). The request broker system permits an exchange of information between the client terminals and the servers through communication paths (31) defined between each of the terminals and the servers. The information management system controls the location, access, and transfer of information between client terminals and the servers through the communication paths connecting the control and management agent system of each of the client terminals and the servers to the information management system. Notably, Raz does not expressly describe nor suggest an apparatus, or a method, for choosing an error proofing technique to fit a given application, or storing an error proofing technique within a database.

Buzsaki describes a method for executing a workflow (100) that requires input from a role. The workflow is executed in a first process (216) until an operation requiring input from a role is detected. Continuation information is stored indicating the workflow operation requiring input from the role. The request for input from the role is then communicated to a computer-user identified with the role. After receiving input from the computer user, execution of the workflow is then resumed in a second process (217) that is based on the continuation information, and starts at the operation that required input from the role. The operation that required input from the role is executed based on the response received from the computer-user identified with the role. Notably, Buzsaki does not describe nor suggest a plurality of tables, wherein at least one of the tables includes at least one error proofing

example and meta-data defined by a user when creating an error proofing example. Rather, at column 8, lines 13-61, Buzsaki describes an error column (540) which only identifies actual errors encountered during execution of the workflow activity and does not include any meta-data defined by the user when the error proofing example was created.

To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974) (MPEP 2143.03). Applicants respectfully submit that neither Raz nor Buzsaki, considered alone or in combination, describe or suggest the claimed invention. Claim 1 recites a system including "a plurality of clients, each said client comprising a plurality of user interface classes and at least one class that provides access to a database...a server comprising a plurality of servlets, at least some of said servlets providing at least one of a database and server access capability to each said client...said database comprising a plurality of tables, at least one of said tables comprising at least one error proofing example entered by a user and meta-data that describes the error proofing example, the error proofing example and meta-data defined by the user when creating an error proofing example, said database accessed by each said client via said server."

Neither Raz nor Buzsaki, considered alone or in combination, describes or suggests a system that includes a plurality of clients wherein each client includes a plurality of user interface classes and at least one class that provides access to a database, a server that includes a plurality of servlets wherein at least some of the servlets provides at least one of a database and server access capability to each client, and the database includes a plurality of tables, at least one of the tables including at least one error proofing example entered by a user and meta-data that describes the error proofing example, the error proofing example and meta-data defined by the user when creating an error proofing example, the database accessed by each client via the server. Specifically, Neither Raz nor Buzsaki, considered alone or in combination, describes or suggests a database that includes a plurality of tables wherein at least one of the tables includes at least one error proofing example entered by a user. Moreover, neither Raz nor Buzsaki, considered alone or in combination, describes or suggests a database that includes meta-data that describes the error proofing example. Further, neither Raz nor Buzsaki, considered alone or in combination, describes or suggests that the error proofing example and meta-data are defined by the user when creating the error proofing example. Rather, as stated in the Office Action, Raz does not disclose the database

table comprising at least one error proofing example, and Buzsaki states at column 8, lines 25-37 that:

The IAS table 500 is used to store information describing the activities executed in a workflow instance. Each time a workflow activity is executed, an entry is added to the IAS table 500. The IAS table 500 includes columns containing information respectively identifying...an error encountered during execution of the activity 540.

At column 8, lines 58-60 Buzsaki states, "the error column 540 is used to identify errors encountered during execution of the workflow activity." At column 8, lines 16-18, Buzsaki states that a workflow instance refers to "execution of a workflow according to a workflow definition." Moreover, at column 3, line 67-column 4 Buzsaki states:

...all workflows...can be described in terms of activities to be performed and transitions between the activities. The activities indicate operations to be performed by the program executing the workflow and the transitions indicate the conditional and unconditional branches to be taken to subsequent activities.

Accordingly, Buzsaki only describes a table that includes a column identifying an error encountered during execution of a workflow activity and simply does not describe or suggest any of an error proofing example entered by a user, meta-data, entered by the user, that describes the error proofing example, or that the error proofing example and meta-data are defined by the user when creating the error proofing example. Therefore, since all the claim limitations are not taught or suggested by the prior art, the Office action fails to establish prima facie obviousness of the claimed invention.

Furthermore, Applicants respectfully disagree with the assertion within the Office Action that an error encountered during the execution of a workflow activity, as described by Buzsaki, is the equivalent of an error proofing example and meta-data that describes the error proofing example, and that are both entered by a user as claimed and described in the instant

specification. To the extent understood, Buzsaki simply describes a run-time error during execution of a workflow activity.

Moreover, Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. Obviousness cannot be established by merely suggesting that it would have been an obvious to one of ordinary skill in the art to modify Raz according to the teachings of Buzsaki. More specifically, it is respectfully submitted that a prima facie case of obviousness has not been established. As explained by the Federal Circuit, "to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the applicant." In re Kotzab, 54 USPQ2d 1308, 1316 (Fed. Cir. 2000). MPEP 2143.01.

Moreover, the Federal Circuit has determined that:

[I]t is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the prior art so that the claimed invention is rendered obvious. This court has previously stated that "[o]ne cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention."

In re Fitch, 23 USPQ2d 1780, 1784 (Fed. Cir. 1992). Further, under Section 103, "it is impermissible . . . to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art." In re Wesslau, 147 USPQ 391, 393 (CCPA 1965). Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the cited art, nor any reasonable expectation of success has been shown.

Although it is asserted within the Office Action that Raz teaches the present invention except for disclosing the database table comprising at least one error proofing example, and that Buzsaki discloses the database table comprising at least one error encountered column, no motivation nor suggestion to combine the cited art has been shown. Since there is no teaching nor suggestion in the cited art for the claimed combination, the Section 103 rejection

appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicants request that the Section 103 rejection of Claims 1-20 be withdrawn.

Furthermore, Applicants respectfully submit that no motivation for the combination can be found within Raz and Buzsaki, as Raz and Buzsaki teach away from the present invention as well as from each other. Raz describes an information management system for dynamically controlling the location, access, and transfer of information between client terminals and servers, but does not describe nor suggest an apparatus or a method for choosing an error proofing technique to fit a given application, or storing an error proofing technique within a database. In contrast to Raz, as well as the present invention, Buzsaki describes a method for executing a workflow procedure that requires input from a user, but Buzsaki does not describe nor suggest an apparatus or a method for choosing an error proofing technique to fit a given application, or storing an error proofing technique within a database. Rather Buzsaki describes an error column that is only used to identify errors encountered during execution of the workflow.

If art "teaches away" from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited art, as a whole, is not suggestive of the presently claimed invention. More specifically, Applicants respectfully submit that the combination of Buzsaki and Raz teaches away from the present invention.

Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Raz in view of Buzsaki.

Claims 2-12 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 2-12 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-12 likewise are patentable over Raz in view of Buzsaki.

Claim 13 recites a method for identifying an error proofing technique for a given application using a web-based system wherein the system includes a plurality of clients

including a plurality of user interface classes, a server including a plurality of servlets, and a database including a plurality of tables including at least one example of an error proofing technique entered by a user and user defined meta-data that describes the error proofing example wherein the method includes "entering at least one example of an error proofing technique by a user...accessing a table containing an error proofing example...choosing an error proofing technique to fit the given application."

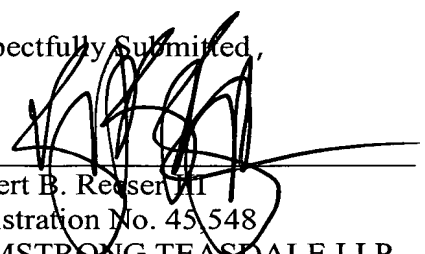
No combination of Raz and Buzsaki describes nor suggests a method for identifying an error proofing technique for a given application using a web-based system wherein the system includes a plurality of clients including a plurality of user interface classes, a server including a plurality of servlets, and a database including a plurality of tables including at least one example of an error proofing technique entered by a user and user defined meta-data that describes the error proofing example wherein the method includes entering at least one example of an error proofing technique by a user, accessing a table containing an error proofing example, choosing an error proofing technique to fit the given application. Specifically, no combination of Raz and Buzsaki describes or suggests a method that includes the step of entering at least one example of an error proofing technique by a user. Moreover, no combination of Raz and Buzsaki describes or suggests a method that includes the step of choosing an error proofing technique to fit the given application. Accordingly, for at least the reasons set forth above, Claim 13 is submitted to be patentable over Raz in view of Buzsaki.

Claims 14-20 depend, directly or indirectly, from independent Claim 13. When the recitations of Claims 14-20 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claims 14-20 likewise are patentable over Raz in view of Buzsaki.

For the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 1-20 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



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